

Hazardous Waste and Toxics Reduction Program Plan

July 2013 – June 2015

Publication and Contact Information

This report is available on the Department of Ecology's website at www.ecy.wa.gov/biblio/1404008.html

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Program Overview

The mission of the Hazardous Waste and Toxics Reduction (HWTR) Program is to foster sustainability, prevent pollution, and ensure safe waste management of the millions of pounds of hazardous substances used and disposed of each year by businesses and households in Washington State.

Program Mission

Foster sustainability, prevent pollution, and promote safe waste management.

Over the longer term, we work with businesses and governments to achieve a system where waste is viewed as inefficient, and most wastes and unnecessary use of toxic substances have been eliminated.

Environmental Threats

Reducing toxic threats is one of Ecology's priority initiatives. There are risks in using and storing—not just disposing of—hazardous chemicals. Some chemicals (such as cleaning products or yard chemicals) can pose an immediate health threat during use. Others pose a risk as products break down or when they are disposed. Some chemicals build up in our bodies and the environment gradually—for example, persistent, bio-accumulative toxics (PBTs), and heavy metals.

When hazardous substances are no longer usable, they become hazardous wastes—or “dangerous wastes” as they are known in Washington¹. Washington's regulation of dangerous waste provides environmental protection not included in the federal hazardous waste rules. Our more protective standards help reduce spills, protect workers, and safeguard businesses that rely on a clean environment for their livelihood. They also create recycling opportunities for Washington businesses. For more details, see *State Dangerous Waste Regulations Protect Human Health and the Environment* at <https://fortress.wa.gov/ecy/publications/publications/1304004.pdf>.

When dangerous wastes are mismanaged, they get into water and soil where they can harm human health and the environment or cause costly cleanup sites. While Washington has had 6,107 toxic sites cleaned up or reported cleaned up in the state, nearly 300 new sites are reported each year. The costs of cleaning up toxic sites range from tens of thousands to millions of dollars per site. When responsible parties aren't able to pay for cleanups, the burden often falls on taxpayers.

Around 1,000 businesses and facilities statewide produce most of the dangerous waste—over 100 million pounds of recurrent dangerous waste each year. Recurrent wastes are predictable by-products of industrial processes. To ensure safe dangerous waste management at these sites, HWTR conducts inspections and provides compliance and pollution prevention technical assistance. We also work with local governments to ensure safe handling of dangerous waste produced in Washington by thousands of smaller businesses—known as Small Quantity Generators. Safely managing dangerous waste is essential to protect human health and the environment.

Avoiding the use of hazardous chemicals in the first place is the smartest, cheapest, and healthiest approach.

¹ Washington law uses the term *dangerous waste*. Federal law uses the term *hazardous waste*. While these terms are often used interchangeably, Washington's definition includes some substances that are not included in the federal definition.

The risk from hazardous substances is not only from leaking drums at an industrial site. Each of us affects the environment, our own health, and the health of others when we buy and use products that contain toxic chemicals. We find hazardous chemicals in our air, water, soil, and in our bodies—in part because they are ingredients found in the products we use in our homes, yards, and offices. Whether the risk is from toxics in products or dangerous waste from industry, our focus is on helping the public and businesses make informed choices about the use of hazardous substances and their ultimate safe disposal.

Authorizing Laws

- Federal Emergency Planning and Community Right-to-Know Act
- Federal Resource Conservation and Recovery Act (1980)
- RCW 15.54, Fertilizer Regulation Act (Ecology's oversight authority over waste-derived fertilizers)
- RCW 49.70, State Worker and Community Right-to-Know Act
- RCW 70.102, Hazardous Substance Information Act
- RCW 70.105, Hazardous Waste Management Act
- RCW 70.105D, Hazardous Waste Cleanup Act—Model Toxics Control Act
- RCW 70.95, Solid Waste Management—Reduction and Recycling Act
- RCW 70.95C, Waste Reduction Act
- RCW 70.95E, Hazardous Waste Fees
- RCW 70.95G, Packages Containing Metals
- RCW 70.95M, Mercury
- RCW 70.285, Brake Friction Material
- RCW 70.295, Storm Water Pollution—Coal Tar
- WAC 173-303, Dangerous Waste Regulations
- WAC 173-305, Hazardous Waste Fees
- WAC 173-307, Pollution Prevention Plans

Constituents/Interested Parties

- The public
- State and local governments and other agencies
- Business groups and associations
- Regulated businesses and agencies
- Tribes
- Environmental groups
- Federal agencies, such as the U.S. Environmental Protection Agency (EPA)

Issues

Focus on Compliance

While Ecology works to prevent tomorrow's toxic threats, we strive to manage today's dangerous waste safely. Routine inspections are a critical regulatory line of defense between the millions of pounds of dangerous waste produced in Washington and environmental contamination. Mismanaging dangerous waste:

- Creates a hazard to workers.
- Allows harmful chemicals to contaminate our water, soil, and air.
- Pollutes stormwater runoff.
- Creates expensive cleanups.

Formal state dangerous waste inspections at larger, regulated businesses and facilities are critical to environmental health. These businesses handle most of the state's dangerous waste. Inspections can be unannounced or scheduled.

During the 2011-13 biennium, HWTR staff performed nearly 800 compliance inspections at facilities that generate or manage dangerous waste. These inspections resolved over 600 serious environmental threats. Such threats have the potential to pollute our environment through leaks or spills from unsafe storage methods or containers.

The inspections also revealed how well facilities complied with state and federal regulations. We found serious environmental violations at 54 percent of regulated businesses we inspected during the 2011-2013 biennium, down from almost 60 percent in the 2009-11 biennium. A federal study by the U.S. Environmental Protection Agency (EPA) of Washington businesses showed a 20 percent increase in environmental threats when more than three years passed between inspections. During the 2011-13 biennium, we completed the highest number of inspections in a decade. By conducting inspections on a regular basis, we hope to continue to reduce the chance of finding serious environmental threats at businesses.

Local Source Control Program

Businesses of all types and sizes use and produce a variety of hazardous substances. Mismanaging even small amounts of hazardous substances can contaminate sites and pollute stormwater. Many smaller businesses had never received an environmental inspection or technical assistance visit until Ecology created the Local Source Control Program.

In 2008, Ecology established performance contracts with 12 Puget Sound counties (in addition to Spokane County). These contracts provide for Local Source Control Specialists to conduct technical assistance visits to small businesses. These technical assistance visits help small businesses comply with dangerous waste and stormwater control laws.

By the end of the 2011-13 biennium, Local Source Control Specialists had conducted over 12,000 small business visits. Ecology's technical assistance helped them better manage their stormwater and dangerous wastes. Almost half of these visits found and addressed minor dangerous waste, stormwater, or spill issues or concerns. In the 2013-15 biennium, the program will add more local government partners and exceed 18,000 total site visits.

State Solid & Hazardous Waste Plan

The state of Washington is required by law to have, and regularly update, a Solid and Hazardous Waste Plan. The plan is designed to guide safe waste management and prevention in the state. Washington citizens, businesses, and governments have made big advancements in our waste management practices over the years. During the 2013-15 biennium, the Waste 2 Resources Program and the Hazardous Waste and Toxics Reduction Program will work with our partners to update the plan. Our goal is to continue to improve current practices, address issues of concern, and advance waste and toxics prevention consistent with the law.

Lean Efforts

Lean is a business philosophy that identifies what is valuable to the customer and eliminates unnecessary steps that get in the way of efficient outcomes or service delivery. The approach identifies and eliminates wasteful and non-value-added activities, without compromising the environment.

For several years, HWTR has helped Washington businesses use Lean to improve manufacturing processes. This has increased profits and customer satisfaction while reducing the amount of hazardous substances used and waste created. For example, Accra-Fab in Liberty Lake is saving nearly \$180,000 each year because of Lean (see the video at http://www.youtube.com/watch?v=_4wFciigtFE). The ten businesses that participated in Ecology's Lean and Green Project reported total savings of \$2.1 million per year.

HWTR is also applying Lean to its own work to improve services to our customers and create an internal culture that values continuous improvement. Recently, we streamlined the way we prepare, conduct, and follow up on dangerous waste inspections. Our goal is to free up time to do more inspections because a stronger field presence results in fewer serious violations that can harm people or the environment. We will track our results during the 2013-15 biennium.

Updated Rules

As EPA updates its regulations, the state is required to amend the Dangerous Waste Regulations. In the 2013-15 biennium, Ecology will incorporate new federal hazardous waste rules into the Dangerous Waste Regulations. This rulemaking is necessary to keep our rules current with federal law and maintain state authorization. Some rules we adopt to stay current with the federal program; others are optional, but help streamline or clarify existing rules. HWTR will also evaluate the need to update and streamline other rules, such as Pollution Prevention Plans (WAC 173-307).

Pollution Prevention Planning

\$56 million saved. That's what Washington businesses said Pollution Prevention (P2) planning has done for them since 2005. The actual total is probably much higher, since businesses are not required to report cost savings.

Businesses must submit P2 planning if they generate more than 2,640 pounds of dangerous waste per year or if they are required to report as part of the national Toxic Release Inventory. These plans identify opportunities to voluntarily reduce hazardous substances used and waste generated.

P2 planning is just one of Ecology's programs that help businesses reduce costs and avoid risks while protecting the environment. These businesses have reduced their waste by more than 50 percent over the past 20 years.

Reducing Risk through Technical Assistance to Businesses

Face-to-face technical assistance visits result in voluntary compliance rates of 90 percent or higher. Hundreds of businesses in Washington have saved money and increased their competitive advantage by reducing their use of hazardous substances, ensuring better compliance with state dangerous waste laws.

Two items are key in breaking the cycle of ongoing cleanup expenses: (1) to use fewer toxic chemicals; and (2) to safely manage those hazardous substances for which no substitute is available. Facilities that produce more dangerous wastes tend to run a higher risk of mismanaging that waste. Mismanaged wastes can contaminate the environment and may eventually require cleanup.

During the 2011-13 biennium, HWTR staff conducted over 900 business assistance visits. We provided business-specific advice on how to:

- Reduce the use of hazardous substances.
- Avoid generating waste.
- Manage dangerous waste safely.

We focused on improving operations and maintenance in industries with the highest rates of waste generation and non-compliance. We showed their staff how to:

- Achieve energy savings.
- Conserve water.
- Prevent stormwater contamination.
- Use fewer hazardous substances.

Savings of more than \$3 million per year are projected for the 35 companies Ecology's Technical Resources for Engineering Efficiency (TREE) Team has assisted. TREE provides a team of engineers who are experts in industrial processes and pollution prevention to work with small and medium-sized businesses that don't have in-house resources.

For example, Huntwood Industries, a Spokane area cabinet manufacturer, requested help from Ecology's TREE team. Huntwood's goals were to:

- Reduce their wash solvent. Huntwood is a Large Quantity Generator of dangerous waste, and solvent waste is by far their largest dangerous waste stream.
- Cut the amount of dangerous and solid waste generated by their manufacturing processes.
- Conserve water used to irrigate the landscape and lawn surrounding the plant.

As a result of the TREE team review, Huntwood found they could save over \$300,000 each year by reducing water use, solvent purchases, and dangerous waste generation.

Safer Chemicals

The public's concern about toxic chemicals in everyday consumer products has increased during recent years. Consumers are more aware of potential health issues—including cancer, hormone disruption, and harm to normal development—associated with toxic chemicals. The public wants to know if these types of chemicals are in the products they use.

More and more, studies show that commonly used household products can contain chemicals of concern for both humans and the environment. For example, polychlorinated biphenyl (PCB) contamination in the Spokane River is not from just a few industrial dischargers, but also from the use of consumer products containing legal levels of PCBs, such as motor oil, hydraulic fluid, pigments, and caulk.

The effects of toxic chemical exposure to human health, the environment, and the economy are increasingly of concern. This is preventable – prompting state, national, and international efforts to transition to safer chemistry. A number of Ecology projects supporting safer chemicals will continue in 2013-15, including:

- A multi-state effort to reform the federal chemical management law (the 1976 Toxic Substances Control Act), which includes using a set of states' principles on national chemical policy reform.
- Certifying manufacturer compliance with the Better Brakes Law and assessing the availability of alternative auto brake friction materials that eliminate or reduce copper, asbestiform fibers, cadmium, lead, and mercury. Right now, these toxic substances are being washed off roads into streams, rivers, and Puget Sound.
- Increased distribution and use of Ecology's Quick Screen method for identifying highest-risk chemicals and safer chemical alternatives.
- The Toxics in Packaging Clearinghouse—a consortium of states working to keep regulated toxic metals out of consumer products packaging.
- A roadmap for advancing green chemistry in Washington State, including creating a Green Chemistry Center. Some of the goals of the center are to:
 - Support and facilitate designing and advancing innovative chemistries that are environmentally benign; minimize waste; and reduce energy/resource impacts in chemical processes and technologies.
 - Promote industry cross-sector collaboration and industry-academia opportunities to advance adoption of green chemistry practices.
 - Convene university researchers and educators to prioritize green chemistry research needs, integrate green chemistry science curriculum, and enhance student-learning opportunities.
 - Support training and information exchange on green chemistry and hazard assessments in Washington State.

Permitting and Corrective Action

Ecology issues permits to specially-designed dangerous waste treatment, storage, and disposal (TSD) facilities. The state's three active commercial TSD facilities received permit renewals in the 2009-11 biennium. These commercial TSDs handle millions of pounds of dangerous waste generated by other businesses or facilities.

Ecology also oversees closure and necessary cleanup at these and former facilities. TSD facilities, mostly located near Puget Sound, are often contaminated and require some form of cleanup. This cleanup is known as corrective action.

Corrective actions are going on at 41 priority sites because of their significance as designated by EPA. Ecology expects to have these 41 cleanups finished, or in maintenance mode, by 2020. We had completed an overall average of 79 percent of the work at these sites by the close of the 2011-13 biennium. The full cleanup process takes 10-12 years to complete.

Human exposures are under control at 90 percent of these facilities. Contaminated groundwater is under control at 79 percent of the facilities. This exceeds EPA's national goals for 2013 of 85 and 73 percent, respectively. Cleanups are expensive, but we can recover most costs from the property owners. Once clean, these properties provide opportunities for habitat restoration, economic development, and public recreation.

Access to Hazardous Substance and Waste Information

HWTR's data systems gather, maintain, and report hazardous substance and dangerous waste information. We retrieve and report the data to individuals and businesses, emergency responders and local government decision makers. Our website, printed materials, telephone information line, and program newsletter, *Shoptalk* (www.ecy.wa.gov/programs/hwtr/shoptalkonline/index.html), provide current hazardous substance and dangerous waste information. These resources help businesses and the public make informed decisions on using and safely managing hazardous substances. During 2011-13, our HWTR Program websites logged more than 560,000 visits, and *Shoptalk* distribution more than doubled to reach over 4,000 subscribers.

Activities, Results, and Performance Measures

Improve Community Access to Hazardous Substance and Waste Information

Ecology uses automated data systems to:

- Track compliance and technical assistance visits.
- Measure pollution prevention and compliance progress.
- Track amounts of dangerous waste generated each year and its proper transport, treatment, and/or disposal.
- Identify toxic chemicals released and stored by businesses.
- Track information on facilities that prepare Pollution Prevention Plans (P2 Plan) and pay fees.

These data systems provide Ecology, the public, and local governments with accurate information about the type, location, and source of hazardous substances that affect them. Consistent with federal and state Community Right-to-Know laws, Ecology also responds to public inquiries about toxic chemicals and provides a website for this purpose.

Expected Results

Dangerous waste and chemical data (type, location, amount, etc.) is available to emergency responders and local governments. Citizens and decision makers have access to dangerous waste and hazardous substance data in their communities. Ecology accomplishes this through:

- Creating new public web pages for environmental justice issues and toxic chemical releases.
- Increasing Shoptalk newsletter distribution to 5,000 readers.
- Creating or updating 50 business publications each year and posting them to the web.
- Writing and distributing 10 business P2 success stories during the biennium.
- Using the results of a new business survey to update our compliance and toxics reduction education and outreach strategies and material, including web content and publications.
- Updating our P2 Plan submittal system (Turbo Plan) so it is easier for businesses to use.

Performance Measures

- Number of visits to toxics-related websites.

Increase Compliance and Act on Environmental Threats from Hazardous Waste

Each year, Ecology conducts formal compliance enforcement inspections at large and medium quantity generators and hazardous waste management facilities to ensure compliance with state and federal regulations. A credible, formal enforcement capability is essential to preserving the effectiveness of technical assistance and informal enforcement efforts.

Ecology staff do not take formal enforcement action often, but repeated refusal or inability of a facility to correct violations and comply with regulations will escalate to formal enforcement action. When possible, we use a streamlined enforcement and settlement approach. This frees up inspectors to do more inspections instead of spending excess time with legal proceedings.

The state periodically amends our Dangerous Waste Regulations. This keeps our rules current with the federal program and maintains the state's authorization.

Expected Results

Large and medium quantity generators and facilities that treat, store, or dispose of dangerous wastes are in compliance with state and federal regulations designed to protect human health and the environment. We accomplish this through:

- Conducting over 400 compliance inspections annually.
- Leaning our compliance inspection process to add capacity for additional inspections.
- Responding to 100 percent of dangerous waste related complaints (approximately 120-180 complaints per year).
- Using streamlined enforcement and settlement approaches as opportunities arise.
- Issuing timely enforcement actions that result in a deterrent to businesses and change behavior.
- Focusing on reducing the number of significant environmental threats found during inspections.

Performance Measures

- Number of significant toxics-related environmental threats resolved.
- Percent chance of finding a significant environmental threat during a compliance inspection.

Increase Safe Hazardous Waste Management

Ecology provides education and technical assistance to thousands of businesses on safe dangerous waste management. Safely managing dangerous waste protects the public and the environment and allows the state to avoid significant cleanup costs.

Although formal enforcement work is essential to maintaining compliance with dangerous waste regulations, training and technical assistance visits can also help bring facilities into regulatory compliance using fewer resources. Even small amounts of mismanaged toxic chemicals can create contaminated sites and pollute stormwater. To address environmental threats from small businesses, Ecology oversees performance contracts with 20 Puget Sound local governments (and Spokane County). These contracts provide for Local Source Control Specialists who conduct technical assistance visits to small businesses.

Expected Results

Dangerous waste is safely managed, the public is protected, and businesses comply with state dangerous waste rules. We accomplish this through:

- Conducting up to 200 compliance-related technical assistance visits to businesses each year.
- Creating new web-based dangerous waste tutorials to help businesses properly manage dangerous waste.
- Issuing guidance for heavy metals found in zone-marking paint and properly managing auto shred residue.

Performance Measures

- Number of toxics-related technical assistance visits.
- Number of Ecology funded small business technical assistance visits conducted by local government.

Prevent Hazardous Waste Pollution through Permitting, Closure, and Corrective Action

Facilities that treat, store, and/or dispose of dangerous wastes are required to obtain a permit to ensure that their design, construction, maintenance, and operating procedures protect public health and the environment. Washington currently has 14 active facilities that are either in "interim status" or have a final permit.

When business needs or requirements change, Ecology works with facilities to modify their permits. When these facilities close, Ecology ensures they have a required closure plan in place to effectively deal with the end of their waste management activities. Environmental contamination found at any time before closure requires a corrective action cleanup plan. Ecology is currently working on 22 high-priority corrective action cleanup sites.

Ecology also ensures that proper financial assurance requirements are in place at all used oil processors and recyclers and facilities treating, storing, or disposing of dangerous wastes.

Expected Results

Facilities that treat, store, or dispose of dangerous wastes are constructed and operated to prevent soil, water, or air contamination. We accomplish this through:

- Striving to meet EPA's cleanup goals for protecting human health, controlling migration of contaminated groundwater, and sites reaching "remedy construction complete."
- Issuing one high-priority draft operating permit.

Performance Measures

- Percent progress toward completed corrective action.

Reduce the Generation of Hazardous Waste and the Use of Toxic Substances through Technical Assistance

The state Hazardous Waste Reduction Act calls for reduced hazardous waste generation and use of toxic substances, and requires certain businesses to prepare a plan for voluntary reduction. Ecology staff provide onsite assistance through innovative programs designed to reduce source and waste generation. Ecology also focuses on improvements in industries that have the highest rate of waste generation and non-compliance to help them achieve energy savings, water conservation, and reduced hazardous waste production. Reducing the use of toxic chemicals in commerce reduces generation of hazardous waste, minimizes disposal costs, reduces the need for cleanup, minimizes public exposure, and saves businesses money.

Expected Results

Less dangerous waste produced and fewer toxic chemicals used, resulting in disposal cost savings for businesses, reduced public exposure, and fewer site cleanups. We accomplish this through:

- Completing nearly 500 toxics-related technical assistance visits to businesses each year.
- Reviewing 100 percent of P2 Plans (approximately 450) submitted by businesses and facilities each year.
- Tracking the number of P2 opportunities and dollars saved by businesses implementing their P2 plans.
- Conducting two to four comprehensive engineering or Lean-based technical assistance projects with businesses each year.

Performance Measures

- Pounds of hazardous waste generated.

Reduce Toxic Chemicals in Products and Promote Safer Alternatives

Toxic chemicals in some consumer products have been found to be a source of pollution in our environment and potentially harmful to humans. Reducing toxic chemicals in products over time will lower the risks to humans and the environment. Making significant progress toward achieving this goal requires several strategies:

- Identifying chemicals of concern in consumer products and promoting safer alternatives to identified chemicals.
- Promoting green chemistry.
- Promoting environmentally preferred purchasing.

Expected Results

Exposure to toxic chemicals will be reduced over time. This is accomplished through:

- Sampling children's products and enforcing reporting requirements and standards of the Children's Safe Products Act (CSPA).
- Enforcing limits in bisphenol A (BPA), lead wheel weights, coal tar sealants, polybrominated diphenyl ethers (BPDE), and copper brake pads.
- Testing for metals and enforcing limits in packaging.
- Developing Ecology alternative assessment guidelines and a Green Chemistry Center to provide businesses with tools and resources to reformulate products with less toxic ingredients.

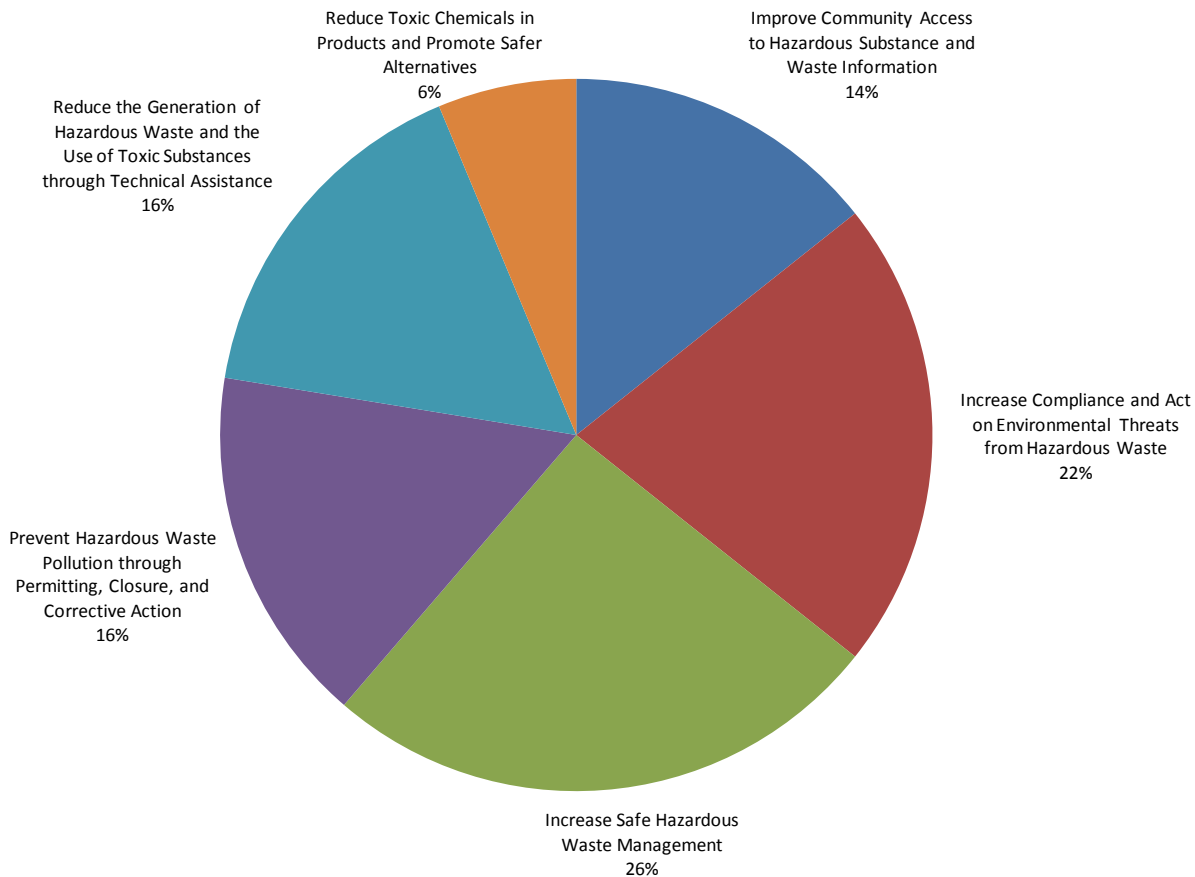
Performance Measures

- Pounds of toxic substances used by Washington businesses and facilities required to submit P2 Plans.
- Pounds of mercury collected and/or captured.

2013-15 Biennium Budget

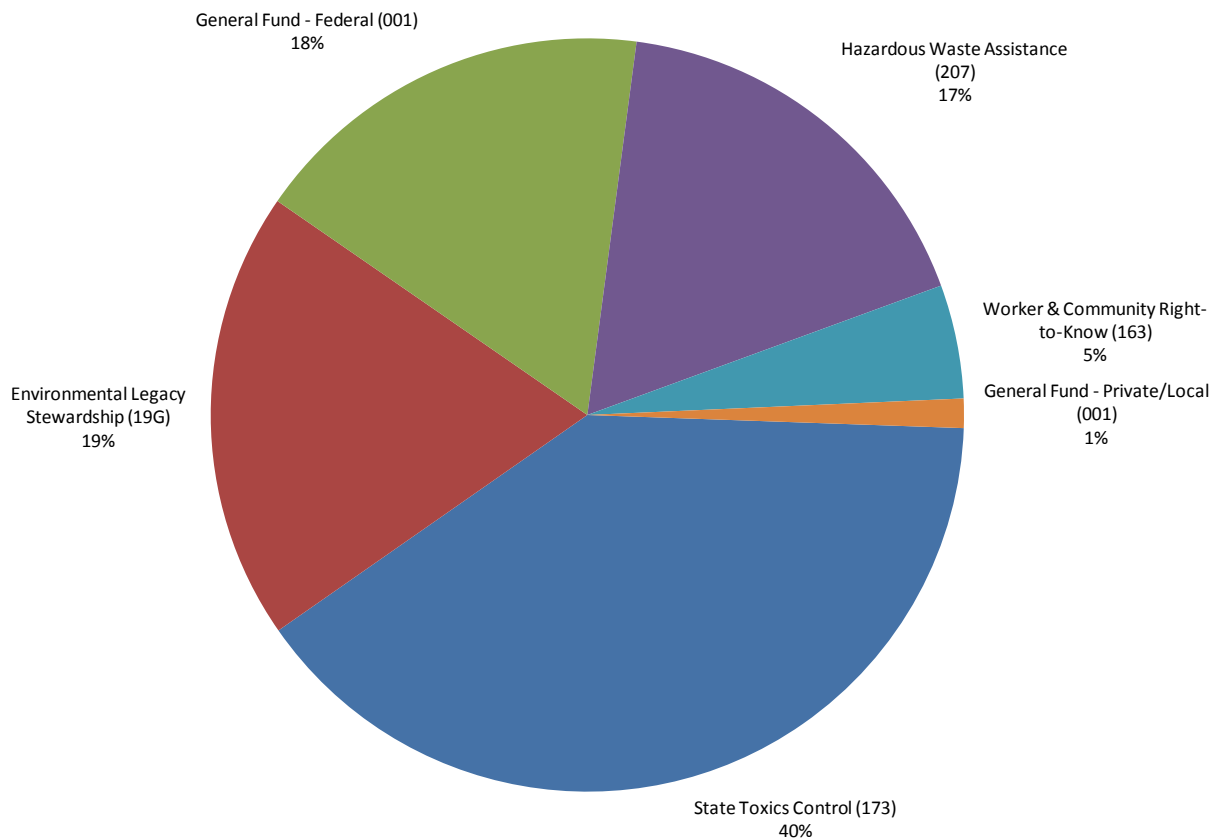
Operating Budget = \$31.6 Million; FTEs = 123.9

Budget by Program Activity



Activities	Dollars	FTEs
Improve Community Access to Hazardous Substance and Waste Information	4,526,321	24.5
Increase Compliance and Act on Environmental Threats from Hazardous Waste	6,760,946	32.5
Increase Safe Hazardous Waste Management	8,103,212	17.3
Prevent Hazardous Waste Pollution through Permitting, Closure, and Corrective Action	5,144,316	19.2
Reduce the Generation of Hazardous Waste and the Use of Toxic Substances through Technical Assistance	5,102,145	22.6
Reduce Toxic Chemicals in Products and Promote Safer Alternatives	1,991,021	7.8
Hazardous Waste & Toxics Reduction Operating Budget Total	\$31,627,961	123.9

Budget by Funding Source



Operating Fund Sources	D	Uses
State Toxics Control (173)	12,572,112	Promote pollution prevention and safe waste management primarily through technical assistance to businesses, inspections of large quantity generators of dangerous waste and permitted treatment, storage and disposal facilities, and dangerous waste cleanups. Conduct criminal investigations and enforcement actions.
Environmental Legacy Stewardship (19G)	6,107,692	Review and analyze waste-derived fertilizers as part of the fertilizer registration process. Fund and train local government specialists to provide assistance in waste management and reduction and source control. Manage permits, closures, and cleanups at facilities that treat, store, or dispose of dangerous waste.
General Fund - Federal (001)	5,526,142	Grant funds received from EPA to implement federal Resource Conservation and Recovery Act (RCRA) and pollution prevention innovations.
Hazardous Waste Assistance (207)	5,480,944	Provide technical assistance to dangerous waste generators and hazardous substance users. Identify safer chemical alternatives for toxic or hazardous chemicals to help businesses, governments, and citizens make better choices on what to use and buy.
Worker & Community Right-to-Know (163)	1,544,280	Compile information on hazardous substance use and make this information available to citizens and other public entities.
General Fund - Private/Local (001)	396,791	Manage cleanups at facilities that treat, store, or dispose of dangerous waste.

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
PROGRAM TOTAL		115.73			
1. A052 – Reduce the generation of hazardous waste and use of toxic substances through technical assistance.		18.55			
<p><i>The state Hazardous Waste Reduction Act calls for the reduction of hazardous waste generation and the use of toxic substances and requires certain businesses to prepare plans for voluntary reduction. Staff provide assistance through innovative programs for source and waste generation reduction, including more than 480 toxics-related technical assistance visits per year. In addition, the agency focuses on improvements in industries that have the highest rate of waste generation and non-compliance to help them achieve energy savings, water conservation, and reduced hazardous waste production. Reducing toxics in products and the initial generation of hazardous waste minimizes disposal costs, reduces the need for clean-up, minimizes public exposure, and saves money.</i></p>					
1	POLLUTION PREVENTION PLAN TECHNICAL ASSISTANCE , including new plans, plan updates, annual plan reviews (APRs), plan & implement Environmental Management System (EMS) submissions, Pollution Prevention Improvement Project (PPIP) implementation, pollution prevention plan (P3) Quality, and Toxic Metals Prevention (TMP).	7.80	IND 1 (IND A) & HW 1,2,3, 4 (HW A,B,C,D) IND 9 (IND J)	<ul style="list-style-type: none"> • Review 100% of Pollution Prevention (P2) Plan opportunities. • Increase the number or % of opportunities that are marked successful in TurboPlan. • Track dollars saved as reported in P2 Plans. • Each TR staff person should visit all planners once every three years. • Complete final TMP report, including document 150,000 lbs in lead, mercury and cadmium reductions from businesses reporting via TRI, TurboWaste or P2 Planning (or other source if quantifiable). 	<i>Beyond Waste 30 goals for P2 include plan better and more implementation. Specific recommendations discuss more comprehensive plans (hazardous substance use, EPP, solid waste, water and energy use), higher quality plans, implementing more plans. (HW 1,3,4) There is also a milestone on developing an acceptable EMS and environmental reporting systems. (HW 2, & HW B) The Toxic Metals Prevention project helps implement TRAC (IND 12) and using the sector approach to implement the agency's initiatives.(IND 10)</i>
2	Pollution prevention (P2) PLAN TRACKING.	0.45	HW 3 (HW C) IND 12 -- TRAC (IND M)	<ul style="list-style-type: none"> • 90% of core data is reviewed by April 30 of the following year. 	Faster access to data in plans to assist in making policy decisions. Easier tracking of P2 program participation and compliance. Use new P3 reporting system as a waste reduction planning tool to get to a 50% hazardous substance reduction goal.

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
3	NON-PLANNER POLLUTION PREVENTION ASSISTANCE including Technical Resources for Engineering Efficiency (TREE), Lean, site visits to non-planners, and phone calls.	5.85	Sustainability TA IND 4 (IND D) & IND 5 (IND E)--material brokers. Lean & Design only--IND 4 (IND D)&IND 7 (IND G) IND 9 (IND J)	<ul style="list-style-type: none"> • Conduct 2-4 detailed TA projects annually. [Projects may be Lean & Environment, TREE or energy related and involve planners or non-planners.] • Conduct energy assessments per EPA grant (through Dec 2013) and evaluate future need. [These will occur at planners and non-planners/] • Conduct 100 non-planner TA visits. • Track the results of any regional TR "innovation" pilot projects. 	<i>The Beyond Waste plan milestones include most major new businesses in Washington to incorporate more sustainable practices (IND D) and...Businesses and other entities in WA have taken noticeable steps towards becoming brokers of materials. (IND E) Another 30 year BW goal for P2 is to plan earlier by encouraging business to incorporate P2 considerations into the design of their facilities.</i>
4	INCENTIVES and RECOGNITION TO INDUSTRY and GOVERNMENT , including Envirostars and P2 Success Stories.	1.45	IND 3 (IND C) & IND 12 (IND M)--TRAC	<ul style="list-style-type: none"> • Support local EnviroStars Programs, including help with marketing a video and success stories. • Launch Washington's Safer Chemistry Challenge Program. • Write and distribute 10 P2 success stories. 	<i>The Beyond Waste plan recommendations encourage putting in place several BW incentives. (IND 3)</i>
5	OTHER , including administration, supervision, training and teams--TRNet, Sustainability Team.	3.00		<ul style="list-style-type: none"> • Train businesses and staff on use of TurboPlan updates. • Train businesses and staff on identifying safer chemical alternatives. Clarify staff roles and develop basic, required curriculum for TR staff and managers. • Plan and conduct a face-to-face toxics staff training event once per biennium. • Review rules relating to P2 Plans for potential changes. 	<i>More training of staff is in several Beyond Waste plan recommendations (HW 1 relating to more comprehensive plans and HW 3 relating to higher quality plans that are implemented)</i>
2. A022 – Increase safe hazardous waste management through technical assistance.		12.65			
<i>Ecology provides education and technical assistance to thousands of businesses on safe hazardous waste management. Although formal enforcement work is essential to maintaining compliance with hazardous waste regulations, workshops and technical assistance visits also can help bring facilities into regulatory compliance using substantially fewer resources. Safe management of hazardous waste protects the public and the environment, and enables the state to avoid significant clean-up costs.</i>					

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
21	COMPLIANCE-RELATED TECHNICAL ASSISTANCE, including Increased Generator Contact (IGC), Delinquent Annual Reporters (DAR), new notifiers, non-notifiers, sector work, Urban Waters, Local Source Control Partnership Coordination, statistical support.	6.10	HW 5 (HW E)--local source/ staffing levels	<ul style="list-style-type: none"> • Complete 200 compliance-related TA visits. 	Businesses are legally and safely managing hazardous waste, and toxics reduction technical assistance has helped businesses reduce their use of hazardous substances. <i>A 30 year BW goal for compliance is to protect WA waters. Several recommendations address compliance related TA including having additional user-friendly information is available (HW 6) and working toward safer management of SQG wastes (HW5). The overall goal is to have fewer environmental problems due to these efforts.</i>
22	DANGEROUS WASTE AND COMPLIANCE EDUCATION, OUTREACH and REGULATORY ASSISTANCE, including services directory, document development and publication. (Does not include visits.)	1.95	HW 6 (HW F)--web & training	<ul style="list-style-type: none"> • Issue "Shoptalk" newsletter per survey results, including a plan to increase and measure distribution. • Update Services Directory (if resources allow) • Revise compliance-related web content. • Create up to 5 web-based DW workshop audio/visual training modules for use by regional offices (FY14). • Regions to host pilot DW workshops/webinars based on new videos (FY15). 	Reduced use of toxic substance. Better compliance with DW regulations. <i>Another 30 year BW goal for compliance is to improve information availability. The recommendations mentioned above (HW 6 and 7) including possible tools such as more compliance information on the Web and web-based training, and more specific TA for SQG's. Milestone HW F states the businesses use the additional compliance information and have a better understanding of complying with the regulations.</i>
24	SPECIAL ISSUES, including fertilizer work, recycling determinations, by-product synergy, Mercury switch data, and new industry proposals.	1.05	IND 5 (IND E) only indirectly w/recycling determinations --HW 11 (MRW K)	<ul style="list-style-type: none"> • Address policy issues on traffic paint. • Increase site visits to increase mercury switch turn-ins. 	Statutory requirements are met. Special issues work has clear performance measures. <i>The plan specifically mentions by-product synergy as a way to businesses to take steps toward becoming brokers of materials. (IND E)</i>
25	Auto Shred Residue (ASR).	0.30		<ul style="list-style-type: none"> • Finalize report. Work with shredders on sampling procedures and ASR management. 	Reduce contamination and prevent recontamination by removing known toxic components from vehicles prior to crushing and shredding. Auto shred facilities operate in an environmentally sound manner and produce clean auto shred residue.
26	OTHER, including administration, supervision, training DEVELOPMENT, cross-program teams, national networks, policy development and regulatory interpretation.	3.25		<ul style="list-style-type: none"> • Develop and conduct training identified by Comp Net. 	<i>The BW plan specifically mentions training for inspectors as a way to encourage businesses to have a better understanding of compliance with the regulations. (HW F)</i>

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
	3. A021 – Increase compliance and act on environmental threats from hazardous waste.	31.25			
	<i>The agency annually conducts formal compliance enforcement inspections at large and medium quantity generators and hazardous waste management facilities to ensure compliance with state and federal regulations. A credible, formal enforcement capability is essential to preserving the effectiveness of technical assistance and informal enforcement efforts. While staff undertake formal enforcement infrequently, repeated refusal or inability of a facility to correct violations and come into compliance with the regulations will escalate to formal enforcement actions.</i>				
31	INSPECTIONS , including EPA, State Priorities, Urban Waters Initiative, Follow-ups	17.05	HW 5 -local source/ staffing	<ul style="list-style-type: none"> • 410 compliance inspections annually. [This target is rolled forward from FY 13 and is based on a phased increase in inspections from 4 new dedicated positions in 11-13.] • Continue efforts to cut current environmental threat rate to 30% by 2015. 	Increase staff levels so the percentage of environmental threats found will decrease and compliance levels will increase. Less staff time needed per visit with streamlined compliance approaches. Annual site visits increase and EPA commitments met. <i>The BW plan 30 year goals have a focus on protecting WA waters.</i>
32	COMPLIANCE ENFORCEMENT	2.70	HW 5 -local source/ staffing	<ul style="list-style-type: none"> • Utilize streamlined enforcement and settlement approaches as opportunities arise. • Issue timely enforcement actions resulting in a deterrent to businesses and changed behavior. • Utilize press releases to help prevent businesses from violating. 	Utilize streamlined approaches to decrease staff time and AAG expense per enforcement action. <i>The BW plan Recommendation HW 5 includes striving for more efficient enforcement process and regulatory partnerships, especially around stormwater partnerships.</i>
33	COMPLAINT RESPONSE	4.05		<ul style="list-style-type: none"> • Respond to and close out 100% of complaints. (HWTR receives approximately 120 -180 complaints per year.) 	Respond to 100% of complaints, which often result in discovering and resolving serious hazardous waste mismanagement.
34	IMPLEMENT LEAN PROJECTS, only including the work required to identify and plan new tasks. (This does not include new or different) work.	0.15		<ul style="list-style-type: none"> • Complete pre-notification pilot report and evaluate next steps by Jan 14. • Lean the p2 fee process. • Track compliance inspection start-to-finish time. • Work with ITSO on next steps of PIMS leaning. • Pilot and test HW Reg Interp Library (HUB), including long-term maintenance needs. Results to PMT by Dec 13. 	
35	RCRA AUTHORIZATION and RULES.	0.75		<ul style="list-style-type: none"> • Update federal rule updates expected, along with review of state rules, en route to RCRA re-authorization. 	RCRA authorization and rulemaking complies with state and federal law, meets agency and program needs, and use regulation changes to address those risks and drive positive changes.

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
36	OTHER , including administration, supervision, training, and cross-program teams, RCRAInfo, RSVP, Compliance Coordination, CompNet, BEN calculations, Compliance Lean implementation.	6.55		<ul style="list-style-type: none"> • Document compliance network discussions and decisions and make available to staff. • Review state criteria designation levels. 	Staff provided with needed training and forums for discussions to effectively and efficiently conduct compliance network discussions and decisions are documented and available to staff. <i>In the BW plan, training for inspectors is part of Recommendation HW 6 so that businesses will have a better of how to comply with the regulations.</i>
4. A031 – Prevent hazardous waste pollution through permitting, closure, and corrective action					
<i>Facilities that treat, store, and/or dispose of dangerous wastes (TSDs) are required to obtain a permit to ensure that their design, construction, maintenance, and operating procedures protect public health and the environment. Washington currently has 15 active facilities that are either in "interim status" or have a final permit. These facilities are required to have closure plans to effectively deal with the end of their waste management activities. Environmental contamination found at any time before closure requires a corrective action clean-up plan. The agency is currently working on 39 corrective action clean-up sites (22 high-priority facility and 17 medium- and low-priority facilities).</i>					
41	SITE-SPECIFIC CORRECTIVE ACTION WORK , including document development and publication and engineering reviews/inspections.	10.44	HW 10 (HW J)	<ul style="list-style-type: none"> • Reach agreement with EPA on definition of completion. • Ecology will strive to meet EPA's cleanup goals for protecting human health, controlling migration of contaminated groundwater under control, and sites reaching "remedy construction complete. • Washington will contribute, along with other Region 10 states, to meeting EPA Region 10 site-specific goals: advance 1 site for human health, 2 for groundwater under control, 2 for remedy construction complete and 3 permits issued or renewed. • Overall cleanup completion at 87% by end of 13-15. 	<i>All EPA priority cleanup sites will meet the goal of being protective of human health by 2020. The BW plan recommendation HW 10 states that Ecology continues to make progress on the goal to have environmental contamination under control at HWTR permitted corrective actions sites by 2020.</i>
42	PERMITTING , including permit modifications, other TSD regulatory options, document development & publication, web content, engineering reviews/inspections and financial assurance.	4.35	HW 8 (HW H) HW 9 (HW I)	<ul style="list-style-type: none"> • Issue one high priority draft TSD permit (PRS) • Process 5 - 10 permit modifications per year. (Scheduled permit mod requests will be considered high priority; unscheduled requests will be prioritized based on importance and current work load. Permit mods on expired permits will happen only if they have an environmental benefit.) 	

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
43	SITE-SPECIFIC CLOSURES , including used oil recycling facilities (continue to hold), post-closure, document development & publication.	0.78		<ul style="list-style-type: none"> • Ensure proper financial assurance requirements are in place at used oil processors and recyclers. • One TSD closure expected (Thermo Fluids). 	Riskier sites are targeted. <i>Recommendation 11 focuses on safe hazardous waste recycling.</i>
44	OTHER , including administration, supervision, work not specific to an individual site, training and cross-program teams, CAN.	3.58	HW 11 (4W K)	<ul style="list-style-type: none"> • Hire HQ corrective action coordinator. Duties include: 1) improve web information, such as "contained in" guidance as HQ resources allow; 2) continue to monitor EPA's national enforcement strategy for CA; 3) prioritize a list of things we can do to speed up CA progress, 4) be program lead for 5296 report requirements. 	Corrective Action Network: Timely and efficient communication internally between corrective action staff, with EPA region 10 and facilities subject to permitting or corrective action. <i>One of the 30 year goals for Permitting/Corrective action is existing TSD's are transformed to "second generation" TSD's that provide treatment of the remaining wastes or reusable materials for industrial uses.</i>
5. A019 – Improve community access to hazardous substance and waste information. "Community" includes the public, private businesses, non-profit organizations, and government sectors.					
<i>The agency uses automated data systems to track compliance and technical assistance visits; measure pollution prevention and compliance progress; track amounts of dangerous waste generated each year and its proper transport, treatment, and/or disposal; identify toxic chemicals released and stored by businesses; and track information on facilities that prepare pollution prevention plans and pay fees. It provides the agency, public, and local governments with accurate information about the type, location, and source of hazardous substances that affect them. In accordance with federal and state Community Right-to-Know laws, the agency also responds to public inquiries about toxic chemicals and provides a Website for this purpose.</i>					
51	ENVIRONMENTAL JUSTICE (EJ) , including leading Ecology agency-wide coordination.	1.20		<ul style="list-style-type: none"> • Protocol is developed for HWTR's assessment of compliance inspections and enforcement efforts relative to state demographics and the program's activities affecting low-income, minority, or Tribal populations. • Ecology develops and posts a multi-lingual environmental justice public web site. • Develop EJ guidance/handout for field staff. 	EJ communities are equally served and protected by Ecology's work. Ecology staff understands and applies agency's EJ values and guidance. EJ communities are supported to engage in Ecology's public participation activities. Ecology's relationship with EJ communities is clear and accessible to those communities. <i>One of the key principles and strategies of the plan is to "Build on current Environmental Justice efforts ..."</i>
52	WEBSITE MAINTENANCE, UPDATES and REVISIONS (Internet, Intranet, SharePoint) (Does NOT include content development.)	1.90	IND 2 (HW B)	<ul style="list-style-type: none"> • Clarify program/agency SharePoint vs. Intranet use. 	The web team works effectively with staff to maintain and add information to our web site. Information on our web site is current and well written. It contains new information on waste management and P2 for specific to business types.

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
53	SYSTEMS DEVELOPMENT, MAINTENANCE, and UPDATES including TurboPlan, Turbowaste.Net, RCRAInfo, RSVP, HWTRInfo, LSC database, and IT POLICY. (Does not include data entry.)	4.60		<ul style="list-style-type: none"> • Maintain Local Source Control database and add priority reports. • Re-engineer/Maintain TurboPlan and add priority reports. • Modify EPCRA system. • Prepare for Turbo Waste rebuild. 	No major crashes or failures. Systems support program mission and decision-making for better targeting and policies.
54	DATA MANAGEMENT & ANALYSIS , including GIS, QUALITY ASSURANCE, QUALITY CONTROL. (Does not include data entry.) Institutional memory, program data and performance measure analysis.	2.05		<ul style="list-style-type: none"> • In coordination with other programs, continue to grow our GIS efforts as resources allow. • Use detailed data analysis to 1) better understand the drivers associated with our OFM hazardous waste reduction measure and 2) update the metrics of our toxic substance reduction OFM measure. 	Data is transformed into useful information for program activities, performance measures, and fee collection needs.
55	EMERGENCY PLANNING & COMMUNITY RIGHT-TO-KNOW ACT (EPCRA) , including support of the State Emergency Response Commission (SERC), data entry, Tier Two and Toxic Release Inventory (TRI) presentations, communication strategies with state, tribal, and local governments.	2.70		<ul style="list-style-type: none"> • Make more TRI information available to the public via data snapshots on the web. • Publish "Chemicals in Washington" on-line report annually. (if resources allow) • Tier Two reports are collected, analyzed and distributed annually to emergency responders. • Continue to coordinate with L&I on worker-right-to-know account. 	Hazardous chemical information is readily available to state, tribal and local emergency operations so local communities are better prepared to respond to emergencies involving hazardous materials.
56	HAZARDOUS SUBSTANCE INFORMATION AND EDUCATION OFFICE (HSIEO) , 1-800 Information phone /e-mail service and website.	0.10	IND 14 (IND P, IND Q) & MRW 11	<ul style="list-style-type: none"> • Respond to highest-priority telephone and email information requests from citizens and businesses, as time allows. 	Growing degree of awareness and understanding about toxics in products leads to refinements of our outreach and education activities and drives decisions to better educate citizens about toxics and hazards in their communities. <i>The BW plan has a specific recommendation related to toxics education and two milestones-- "Statewide education...is in place," and "fewer toxic products are purchased, misused and disposed of improperly" (IND 14, IND P, IND Q--also in MRW section)</i>
57	DOCUMENT DEVELOPMENT, REVIEW, AND PRODUCTION: formatting, distributing for reviews including Plain Talk, printing if needed. (Does not include content experts.)	0.95		<ul style="list-style-type: none"> • Create or update up to 50 business publications annually, posting to the web and making available for electronic distribution. 	Publications team works effectively with program staff to develop new publications. When possible, information developed is used to enhance web content. Publications influence behavior changes that provide positive environmental results. HWTR story is accurately told.

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
58	ANNUAL REPORTING and FEE ADMINISTRATION for hazardous waste generation and planning fees, including notifications, invoicing, collections, electronic payments, and fee administration.	4.13		<ul style="list-style-type: none">• Approx. 4,000 hazardous waste reports from businesses are collected and analyzed yearly.• P2 and Generation fees invoiced and re-billed on time.• Continue to add appropriate industry sectors to be invoiced.• Review rules relating to P2 and Generation Fees for potential changes.	Fee revenue supports HWTR needs.
59	OTHER , including administration, supervision, translations, training, cross-program teams, marketing, records management, and community access to open data.	2.25		<ul style="list-style-type: none">• Support Translation Teams as needed.	Better marketing of agency activities and messages leads to improved communication and coordination across and between programs.
6. A065 – Reduce toxic chemicals in products and promote safer alternatives. (Activity created July, 2010, and represents work in both HWTR and W2R programs. This document includes only tasks and FTEs in HWTR.)		7.45			
Toxic chemicals in products are polluting our environment and have the potential to harm humans. Reducing toxic chemicals in products overtime will lower the risks to people and the environment. To make significant progress toward achieving this goal requires several strategies; identifying chemicals of concern and strengthen the ability to gather data on the presence of these chemicals in products and the environment; improve tools and authorities to promote safer alternatives; promote green chemistry; and, improve education, outreach and communication. Reducing toxic chemical threats is the smartest, cheapest and healthiest approach to protecting people and the environment.					

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
61	CHEMICALS OF CONCERN/HIGH PRIORITY CHEMICALS , Children's Safe Product Act (CSPA), Chemical Action Plans (CAPs), emerging contaminants, better brakes, mercury, toxics in packaging, and product testing.	1.70	IND 8 (IND H) IND 11 (IND L) MRW 1 (MRW A)	<ul style="list-style-type: none"> • Provide support to other Ecology programs to support implementation of the Children's Safe Products Act and development/implementation of CAPs. • Collect/capture an additional 4,500 lbs. of mercury • The Better Brakes effort will publicize the requirements, certify manufacturer compliance, track friction materials, and assess the availability of alternative materials. • Product testing and enforcement will 1) continue baseline screening and testing of packaging for metals (Cd, Hg, Pb) and enforcement of positive results and expansion of additional chemicals under the Children's Safe Product Act 2) complete the current projects of metals, parabens, phthalates and VOCs in children's products, flame retardants in consumer products and PCBs in pigments and dyes. 	<i>High priority chemicals are big focus in the BW plan in a number of recommendations including Children's safe products act implementation, and sector work. Some specified milestones include: Safer alternatives are identified for 10 priority chemicals (IND H), At least two successful sector campaigns...(IND J), the Lead CAP is implemented (MRW C), and for mercury, product stewardship for lamps and a national repository is in place and continues to diminish in biosolids. (MRW B, IND R)</i>
62	ALTERNATIVE ASSESSMENTS & GREEN CHEMISTRY , including green chemistry roadmap and new center, conducting alternative assessments, Interstate Chemicals Clearinghouse (IC2), emerging technologies (nanotechnology).	2.95		<ul style="list-style-type: none"> • The green chemistry center will establish its mission, a steering committee, 501c3 filing status and ways to secure ongoing funding. • Support implementation of TRS recommendations including work with the TRS stakeholder group. • Successfully implement Sectors go Green. • Completion of at least 6 hazard assessments (through P2 grant; more if we get additional funding). • Increase distribution and use of Ecology's "green screen" for identifying safer chemical alternatives. 	<i>Recommendation IND 8 of the BW plan states, "Eliminate or minimize groups of the most toxic chemicals" ...with support for safer alternatives, research, development of green chemistry curricula, regulatory and legislative options including TSCA reform and Interstate Clearinghouse of Chemicals, etc. Milestone IND H states, "Multiple states have agreed on a chemical assessment protocol to identify safer alternatives to priority chemicals. Safer alternatives are identified for 10 priority chemicals.</i>
63	ENVIRONMENTALLY PREFERABLE PURCHASING (EPP) & PRODUCT STEWARDSHIP	0.30		<ul style="list-style-type: none"> • Explore 1) state purchase targets that significantly reduce CO2 emissions and toxic chemicals, 2) an EPP Executive Order or bill. • Under WSCA grant, green 4 state contracts by January 2014. • Support EPP Team efforts to improve Ecology's green purchasing efforts. • Continue to work with W2R on Product Stewardship initiatives. 	<i>Recommendation IND 13 in the BW plan states "Support product stewardship legislation...and EPP legislation..." The five year milestones are: "Product Stewardship framework is in place..." and EPP legislation exists and sales of EPP goods and services are increasing". Twelve other BW recommendations also refer to Product Stewardship and several more refer to EPP.</i>

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
64	TOXICS IN STORMWATER & PUGET SOUND , including Puget Sound research, work with the Puget Sound Partnership, work with the WA Stormwater Center, NEP "toxics/nutrients" related projects, and education and outreach efforts.	0.20		<ul style="list-style-type: none"> • Work with the Washington Stormwater Center to develop and distribute a business outreach video and re-package existing stormwater educational materials for use by Local Source Control Specialists. 	<i>Several places in the BW plan refer to toxics in stormwater and protecting Puget Sound. One of the 30 goals for HW compliance is to "protect WA waters". Recommendation IND 11 is "Help minimize the release of toxics into stormwater" with Milestone IND L stating, "An effective strategy exists with minimizes toxics in stormwater...."</i>
65	SUSTAINABILITY TECHNICAL ASSISTANCE including state agency compliance with Governor's Executive Order and Agency Sustainability Team actions.	0.65	IND 4, IND 7 & HW 4 (HW D) IND 9 (IND I)	<ul style="list-style-type: none"> • Sponsor and represent the agency Sustainability Team. • Support agency Global Reporting Framework (GRI) report. 	<i>A key principle and strategy of the BW plan is governmental leadership also known more informally as walk our talk. Almost every section of the plan has a recommendation related to this, although there is nothing specific on agency sustainability plans. Recommendation HW 4 encourages p2 planners to reduce their greenhouse gases.</i>
66	POLICY including legislative initiatives, TSCA reform, incentives, chemicals policy, green chemistry, supervisors' projects, and Network support including SAGE and ToxPol.	1.25	IND 3 (IND C) IND 12 (IND M) IND 13 (IND O) MRW 7 (MRW 1)	<ul style="list-style-type: none"> • Help develop consistent state policy on toxics reform, possibly develop model states legislation. 	<i>Obtain legislative support for TRAC recommendations. Reform state purchasing statutes to drive markets for environmentally preferred products and services. Many BW plan recommendations and milestones relate to legislative initiatives and policy. Some specific milestones are: "the majority of the TRAC recommendations are implemented," "a statewide product stewardship framework is in place", legislation is modified to support more EPP (IND M, IND N, IND O)</i>
67	OTHER -includes administration, supervisory, training, program coordination.	0.40			
7. Program Management and Administration		6.80			
<i>Program management and administration is not an agency activity. Work captured in this category supports and directs the work of program as a whole. The FTEs and cost will be allocated to all 6 program activities to show the full effort required for each activity.</i>					

	Categories	Total FTEs	BW Recom/ Milestone	Results expected in 13-15	What does long-term success look like?
71	POLICY and PLANNING , including Performance Partnership Agreement (PPA) with EPA, Program Plan, Beyond Waste updates and data indicators, OFM performance measures, and statewide mandatory reporting.	1.10	DATA 1, 2, 3, 4,5,(DATA A,B, C,D,E,F,G)	<ul style="list-style-type: none"> • New program plan by Fall 2013. • New PPA by Fall 2013. • New Beyond Waste progress report by Fall 2011 • Report quarterly to OFM on performance measures • Visit all sections to share program planning and OFM measures for 13-15. • State Solid and Hazardous Waste Plan update (including long term strategy for planner/non-planner/safer alternatives work) 	HWTR staff and agency management understand how HWTR's work supports agency's priorities. HWTR achieves progress towards Beyond Waste vision and goals. Beyond Waste Plan and program plan drive HWTR activities. <i>The data initiative is key component of the BW plan with recommendations on developing an annual progress report and basing policy decisions on analysis of trends and projections based on BW indicators. (DATA 2, and 3)</i>
72	FINANCIAL MANAGEMENT , including grants development, grant monitoring, and budget development/monitoring.	1.20		<ul style="list-style-type: none"> • 13-15 spending remains within allotments. • All budget-related tasks submitted on time to Central Budget office. • Grant applications, progress reports, and final reports submitted on time. • Final 13-15 agency budget includes HWTR's highest priority. 	Increased capacity for compliance and prevention work. Increased funding from federal grants. Section managers manage their budgets.
73	ADMINISTRATION , including program manager, administrative assistant, and receptionist.	3.25		<ul style="list-style-type: none"> • The program accomplishes established activities within section budgets. • Staff understand their jobs and have the necessary tools to do them. • Managers complete performance reviews on time. • Managers and staff achieve results as specified in performance evaluations. 	Good working relationships exist between managers and staff. Program meets all performance targets. <i>In the BW plan, DATA A milestone states the majority of W2R and HWTR staff work plan activities correspond to BW indicators.</i>
74	OTHER , including legislative support.	1.25	IND 13 (IND O)	<ul style="list-style-type: none"> • Agency management, legislative liaison, and key legislative staff understand HWTR positions on relevant legislation. • Bill analysis and fiscal notes are completed on time. Explanation of program budget activities and performance measures will be presented to HWTR staff. • Continue to link staff work plans tied more closely to Program Plan. 	Legislature adopts our supported legislation and provides sufficient resources when necessary.